

UNITED STATES DISTRICT COURT

for the
Eastern District of Pennsylvania

In the Matter of the Search of

(Briefly describe the property to be searched
or identify the person by name and address)

The Premises known as 6626 Horrocks Street,
Philadelphia, PA 19149 more fully described in
Attachment A hereto

Case No. 18-1741-M-1

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

See Attachment A - Provided that the execution of this warrant shall be contingent upon the package described in the affidavit being accepted and taken into the above address. If that condition is not satisfied, the warrant is void.

located in the Eastern District of Pennsylvania, there is now concealed (identify the person or describe the property to be seized):

See Attachment B.

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
☒ contraband, fruits of crime, or other items illegally possessed;
☒ property designed for use, intended for use, or used in committing a crime;
☐ a person to be arrested or a person who is unlawfully restrained.

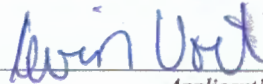
The search is related to a violation of:

Code Section	Offense Description
21 U.S.C. Sections 841 and 846	possession and distribution of controlled dangerous substances and conspiracy to possess and distribute controlled dangerous substances

The application is based on these facts:

See Attachment C.

- ☒ Continued on the attached sheet.
☐ Delayed notice of days (give exact ending date if more than 30 days:) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.



Applicant's signature

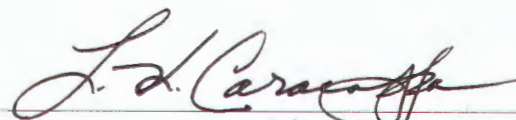
Kevin M. Voit, U.S. Postal Inspector

Printed name and title

Sworn to before me and signed in my presence.

Date: October 29, 2018

City and state: Philadelphia, Pennsylvania



Judge's signature

Hon. Linda K. Caracappa, U.S. Magistrate Judge

Printed name and title

UNITED STATES DISTRICT COURT

for the
Eastern District of PennsylvaniaIn the Matter of the Tracking of
(Identify the person to be tracked or describe
the object or property to be used for tracking)One Priority Mail parcel bearing Priority Mail number
9505511416278300181991, measuring approx.
11.25" x 8.75" x 6" and addressed to "Denise
Santiago, 6626 Horrocks St., Philadelphia PA 19149"

Case No. 18-1741-M-2

APPLICATION FOR A TRACKING WARRANT

I, a federal law enforcement officer or attorney for the government, have reason to believe that the person, property, or object described above has been and likely will continue to be involved in one or more violations of 21 U.S.C. § 841 & 846. Therefore, in furtherance of a criminal investigation, I request authority to install and use a tracking device or use the tracking capabilities of the property or object described above to determine location. The application is based on the facts set forth on the attached sheet.

- ☒ The person, property, or object is located in this district.
- ☐ The person, property, or object is not now located in this district, but will be at the time of execution.
- ☐ The activity in this district relates to domestic or international terrorism.
- ☐ Other:

The tracking will likely reveal these bases for the warrant under Fed. R. Crim. P. 41(c); (check one or more)

- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☒ property designed for use, intended for use, or used in committing a crime;
- ☒ a person to be arrested or a person who is unlawfully restrained.

- ☒ I further request, for purposes of installing, maintaining or removing the tracking device, authority to enter the following vehicle or private property, or both:
One Priority Mail parcel bearing Priority Mail number 9505511416278300181991, measuring approx. 11.25" x 8.75" x 6" and addressed to "Denise Santiago, 6626 Horrocks St., Philadelphia PA 19149"

- ☐ Delayed notice of ____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.



Applicant's signature

Kevin M. Voit, US Postal Inspector

Applicant's printed name and title

Sworn to before me and signed in my presence.

Date: October 29, 2018


Judge's signature

City and state: Philadelphia, Pennsylvania

HON. Linda K. Caracappa

Printed name and title

A F F I D A V I T

I, KEVIN M. VOIT, being duly sworn, depose and say:

I, Kevin M. Voit, am a United States Postal Inspector. I am currently assigned to the United States Postal Inspection Service, Philadelphia Division. I have been employed as a Postal Inspector since April 2016. Prior to becoming a Postal Inspector, I was employed as a federal agent with the Department of Homeland Security for seven and one half years. I have a Bachelor of Science in Business Administration from Rider University in Lawrenceville, NJ.

As part of my duties as a United States Postal Inspector, I investigate the use of the U.S. Mails and private carriers illegally to transport controlled substances and drug trafficking instrumentalities, in violation of Title 21, United States Code, Sections 841(a)(1), 843(b), and 846. I have been trained in various aspects of law enforcement, including the investigation of narcotics offenses. Through my education and experience, and that of other agents, I have become familiar with the methods that individuals use to traffic narcotics through the U.S. Mails.

This Affidavit is made in support of a Search Warrant Application for authority to search the premises located at 6626 Horrocks Street, Philadelphia, Pennsylvania, as more particularly described in "Attachment A" hereto, and for authority to seize evidence, fruits, and instrumentalities of crimes against the United States, specifically, in violation of Title 21, United States Code, Sections 841(a)(1) and 846, as more particularly described in "Attachment B" hereto. Further, this Affidavit is made in support of an order to install and monitor, in private areas, including but not limited to private residences and vehicles, a beeper transponder device and a Global Positioning System ("GPS") device, both of which will be placed in Priority Mail

Parcel Number bearing Priority Mail number 9505511416278300181991, during a controlled delivery of the parcel to the premises located at 6626 Horrocks Street, Philadelphia, Pennsylvania, 19149. Your affiant's request for authorization to execute this search warrant is conditioned upon the Subject Parcel (as described in paragraph 6) being delivered to and taken into 6626 Horrocks Street, Philadelphia, Pennsylvania.

1. This affidavit is based upon my personal knowledge, experience and training, and other information developed during the course of this investigation. This affidavit is also based upon information and experience imparted to me by other law enforcement officers. Because this affidavit is being submitted for the limited purpose of establishing probable cause and securing a search warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that violations of Title 21, United States Code, Sections 841(a)(1) and 846, have been committed and that the parcel addressed to "Denise Santiago, 6626 Horrocks St., Philadelphia PA 19149" contains evidence of these violations and contraband.

I. BACKGROUND

2. Based upon my training and experience, I know that drug traffickers often use any means available to them to transport narcotics. One common method of smuggling drugs is to ship narcotics via the United States Mails, including Priority Mail parcels used for scheduled delivery, and other overnight carriers. In addition, I know that drug traffickers commonly maintain books, records, receipts, notes, ledgers, electronic data, and other items relating to the importation, transportation, ordering, purchase, and distribution of illegal drugs at their residence or at the location at which their trafficking activities are being conducted.

3. In connection with the transportation of drugs, I know that frequently drug traffickers maintain evidence of travel and other records required to arrange for the purchase and importation and distribution of such drugs, and keep tickets, notes, receipts, passports and other documents at their residence or the location where they conduct trafficking activities. I know that drug traffickers maintain records and other documents related to the possession, shipment, tracking and delivery of illegal controlled substances at the location where their drug trafficking activities occur. I know that indicia of occupancy, residency and ownership of premises, including but not limited to utility and telephone bills, canceled envelopes, rental, purchase or lease agreements, identification documents and keys are often maintained at such drug trafficking locations.

4. Further, I know that drug traffickers frequently know others involved in the trafficking of illegal substances, and address and/or telephone books, rolodex indicia, electronic organizers, telephone paging devices and the memory thereof, and papers, records or electronic data reflecting names, addresses, telephone numbers, pager numbers of co-conspirators, sources of drug supply and drug customers, and other items are frequently maintained by such traffickers which provide evidence of the identities of others involved in such trafficking.

5. I also know that drug traffickers frequently use aliases to conceal their identities, and often possess firearms and other weapons at the premises where they conduct drug trafficking. These firearms are used by drug traffickers to protect themselves and/or stash location from being robbed by rival drug traffickers, drug users, and "stick up boys" (individuals who rob drug traffickers to steal their drugs and/or drug trafficking proceeds). Persons who traffic in drugs often maintain at their residences and other locations where they conduct drug trafficking

activities unsold or undistributed supplies of controlled substances and other drugs, drug paraphernalia including chemical dilutents, weighing scales, mixing bowls, glassine bags, spoons, which are utilized in the weighing and packaging of controlled substances.

II. FACTS ESTABLISHING PROBABLE CAUSE

6. On October 28, 2018, the Philadelphia Division of the U.S. Postal Inspection Service identified a suspect Priority Mail package bearing Priority Mail Parcel Number 9505511416278300181991 (hereinafter referred to as the "Subject Parcel"). The Subject Parcel was mailed from Puerto Rico in a USPS Priority Mail flat rate box on October 27, 2018, and has the following characteristics: Priority Mail No. 9505511416278300181991, measuring approximately 11.25" x 8.75" x 6" and bearing the return name/address "Yolanda Santiago Carrasquillo, Cond. Jardin Sereno apt. 803, Carolina PR. 00983" and the delivery name/address "Denise Santiago, 6626 Horrocks St., Philadelphia PA 19149."

7. Investigation of the Subject Parcel, through the United States Postal Service as well as law enforcement database CLEAR, showed the return address does not exist. Further, Denise Santiago is not known to associate to the delivery address. From my training and experience, and the experience of other agents, I know that drug dealers who send controlled substances by the mail or other package delivery services, will often use a fictitious return address name and/or a fictitious delivery addressee name when they are shipping parcels containing controlled substances. They use this subterfuge in order to prevent the mailer of the package from being located.

8. On October 28, 2018, the Subject Parcel was exposed to a drug detection canine named "Chase." Chase is handled by Officer Michael Calchi Badge # 167 with the Millville Police

Department. Officer Calchi has been with the Millville Police Department since 2009 and he has been a K9 handler since 2012. The Millville Police Department certifies Officer Calchi and K9 Chase on a bi-annual basis, and Officer Calchi and K9 Chase have ongoing maintenance training every month during the year. In October 2018, Officer Calchi and K9 Chase successfully completed the certification and are certified in the detection of the following substances: marijuana/hashish, cocaine hydrochloride/cocaine base, heroin hydrochloride, methamphetamine, and MDMA. Officer Calchi advised Postal Inspectors that Chase alerted positive to the presence of illegal narcotics inside the Subject Parcel.

9. On October 29, 2018, the Honorable Linda K. Caracappa, United States Magistrate Judge for the Eastern District of Pennsylvania, issued a federal search warrant to search Priority Mail Priority Parcel bearing Priority Mail Number 9505511416278300181991 (the Subject Parcel). Upon authorization of the search warrant, Postal Inspectors opened the Subject Parcel and found it to contain a rectangular shaped plastic object wrapped in black tape surrounded by packing peanuts. Inside of the rectangular shaped object was another rectangular shaped object in a vacuum sealed bag. The rectangular shaped item inside of the vacuum sealed bag was wrapped in carbon paper, green plastic wrap, a dryer sheet, black rubber, and black plastic wrap. This rectangular shaped item was composed of a white substance (suspected cocaine) and weighed approximately one kilogram. The suspected cocaine was field tested and tested positive for the presence of cocaine. The estimated street value of one kilogram of cocaine is approximately \$100,000 U.S. dollars.

10. The Subject Parcel is presently located at the United States Postal Inspection Service Narcotics Office within the Eastern District of Pennsylvania.

11. On or about October 30, 2018, law enforcement plans on conducting a controlled delivery of the Subject Parcel to 6626 Horrocks Street, Philadelphia, Pennsylvania, 19149 (hereinafter referred to as the "Subject Location"). A U.S. Postal Inspector, posing as a Postal Letter Carrier, will then deliver the Subject Parcel (described in paragraph 6 above) to 6626 Horrocks Street, Philadelphia, Pennsylvania, 19149 (the "Subject Location"). Prior to delivering the Subject Parcel to the Subject Location, law enforcement will remove the contents of the Subject Parcel and replace the suspected cocaine with a smaller representative sample of cocaine as well as a sham substance that is similar in appearance to cocaine. At this time, law enforcement does not know how many people reside in or will be present inside the Subject Location. Based upon my training and experience, and because it is difficult to determine precisely when the recipient or intended recipient will open the Subject Parcel to retrieve the substance inside, this application seeks permission for law enforcement to install entry detection or transponder devices, also known as beepers, and GPS tracking devices, within the parcel. Law enforcement will then deliver the Subject Parcel, containing the sham substance and representative sample of cocaine, along with the beepers and GPS tracking devices, and will use the GPS devices to monitor the whereabouts of the parcel and its contents at all times, including those times when the Subject Parcel has entered the Subject Location or other private property. The beeper devices will also reveal if, and when, the Subject Parcel is opened.

12. These devices are transmitters only and will not monitor voice conversations. The beepers will emit a signal alerting law enforcement as to the moment the Subject Parcel is opened. Because law enforcement expects that the Subject Parcel will be taken into a private locations within a business/private residence when the Subject Parcel is accepted, authority is

sought to monitor the signals of the transponders in private areas, such as buildings, residences and other like closed structures, which are not public (including, but not limited to the Subject Location at 6626 Horrocks Street, Philadelphia, Pennsylvania).

13. It has been the experience of law enforcement that the intended recipients of parcels containing illegal narcotics often have the drug parcels mailed to addresses to which they are not associated, in order to distance them from being arrested during a controlled delivery. In those situations, after the delivery is made, the signor generally drives the drug parcel to another location, or the intended recipient picks up the Subject Parcel and drives it to another location.

14. At this time, law enforcement does not know the ultimate destination of the Subject Parcel. Thus, this application seeks permission for law enforcement to install GPS tracking devices within the Subject Parcel. Law enforcement will then deliver the Subject Parcel with the sham substance and representative sample of cocaine contained inside, along with the GPS tracking devices, and will use the GPS tracking devices to monitor the whereabouts of the Subject Parcel and its contents at all times, including those times when the Subject Parcel has entered the business, any residence, or other private property, including at its ultimate destination. The GPS devices will allow law enforcement to follow the Subject Parcel and its contents if, and when, the Subject Parcel and its contents are taken to another location.

15. Although members of law enforcement will deliver the parcel during daylight hours, they do not know when the parcel will be opened by the intended recipient or recipients. At the moment law enforcement officers are notified by beepers that the package has been opened inside the premises, individuals opening the package may discover that the package has been altered and that beepers have been placed inside the package. As a result, they may destroy

evidence or otherwise take actions which would prevent law enforcement from recovering evidence located inside the premises or to otherwise identify individuals involved in criminal activity. Accordingly, since the Subject Parcel may be opened after daytime hours and may result in the destruction of evidence, additional authority is sought to enter and search the Subject Location, that is, 6626 Horrocks Street, Philadelphia, Pennsylvania, including during the daytime hours (between the hours of 6:00 a.m. and 10:00 p.m.) and/or the nighttime hours (between the hours of 10:00 p.m. and 6:00 a.m.), conditioned upon the successful delivery of the Subject Parcel (containing a representative sample of cocaine and sham substance similar in appearance to cocaine, along with the monitoring devices) and also thereafter, the Subject Parcel being taken into the Subject Location.

16. Because of the sensitive nature of the investigation, an Order is sought sealing the Application, Affidavit, Search Warrant, and Tracking Device Order.

Conclusion

17. This Application seeks authority to enter the Subject Location and to search for and seize fruits, evidence, and/or instrumentalities of the specified federal offenses. More particularly, there is probable cause to believe that at the Subject Location, at the time of the execution of the Search Warrant (upon satisfaction of the stated condition precedent, i.e., that the Subject Parcel is accepted and taken inside the Subject Location) there will be the items, materials, and objects described in Attachment B to the Search Warrant for the Subject Location, which is incorporated herein as set forth in full. As a result, there is probable cause to believe that at the Subject Location, there is now and will be located the fruits, evidence and instrumentalities as set forth in Attachment B.

18. Accordingly, I respectfully request that the Court issue:

a. A Search Warrant for 6626 Horrocks Street, Philadelphia, Pennsylvania, 19149, which law enforcement may execute conditioned upon the Subject Parcel (as described in paragraph 6) being delivered to and taken into the residence;

b. Authority to execute the Search Warrant during the daytime (the hours of 6:00 am and 10:00 pm) or night time hours (the hours of 10:00 pm and 6:00 am), as law enforcement deems necessary; but in no event more than 24 hours after the parcel was delivered;

c. An order permitting law enforcement to monitor, in private areas, the signals emitted by beeper devices, which will be installed in the Subject Parcel to alert law enforcement when the parcel is opened; and an order permitting law enforcement to monitor the signals emitted by GPS devices, in private areas, which will be installed in the Subject Parcel to alert law enforcement to the location of the Subject Parcel and its contents; and

d. An Order sealing the Search Warrant Application,
Affidavit, Search Warrant, and Tracking Device Order until further Order of this Court.

Kevin Voit

Kevin M. Voit
U.S. Postal Inspector

Sworn and subscribed before me
this 29 day of October, 2018:

L. K. Caracappa
HON. LINDA K. CARACAPPA
United States Magistrate Judge

ATTACHMENT A

Premises to be Searched

The premise to be searched is located at 6626 Horrocks Street, Philadelphia, Pennsylvania, 19149, in the Eastern District of Pennsylvania; further described as a brick two-story row home with a white fence in the front yard and the numbers “6626” clearly displayed on a white post.

ATTACHMENT B

Property to be Seized

1. Books, records, receipts, notes, ledgers, or electronic data relating in any way to the importation, transportation, ordering, tracking, purchases and distribution of controlled substances;
2. Priority Mail Parcel bearing Priority Number 9505511416278300181991, measuring approximately 11.25" x 8.75" x 6" and bearing the return name/address "Yolanda Santiago Carrasquillo, Cond. Jardin Sereno apt. 803, Carolina PR. 00983" and the delivery name/address "Denise Santiago, 6626 Horrocks St., Philadelphia PA 19149." and its contents (including the beepers and GPS devices);
3. Papers, tickets, notes, receipts, passports and other items relating to recent domestic and international travel;
4. All records and other documents related to the possession, shipment, tracking and delivery of illegal controlled substances;
5. Any and all records and documents relating in any way to the possession, sale, purchase, transfer, and/or storage of any and all tangible or intangible assets, including but not limited to vehicles, real estate, and jewelry, regardless of the identity of the person(s) involved;
6. Any and all business records, including but not limited to accounts receivable, accounts payable, general ledgers, cash disbursement ledger, check register, employment records, and correspondence, regardless of the identity of the person(s) involved in the transactions;
7. Any and all identification records and documents, including but not limited to birth certificates, state identification cards, social security cards, and driver's licenses;
8. Any and all banking records, including but not limited to monthly savings and checking statements, canceled checks and banking communications, deposit tickets, withdrawal receipts, certificates of deposits, pass-books, money drafts, money orders (blank or endorsed), check cashing logs, wire transfer logs, cashier's checks, bank checks, money orders, safe deposit box keys, safes, money wrappers and wire transfers;
9. Any and all United States currency, money counters and any item used in the counting of currency;

10. Any and all cellular telephones and personal data assistants ("PDA's");

11. Indicia of occupancy, residency, and ownership or use of the subject premises, including, but not limited to, utility and telephone bills, cancelled envelopes, rental, purchase or lease agreements, identification documents and key;

12. Address and/or telephone books, rolodex indicia, electronic organizers, telephone paging devices and the memory thereof and any papers, records or electronic data reflecting names, addresses, telephone numbers, pager numbers of co-conspirators, sources of drug supply, and/or drug customers;

13. Controlled substances, drug paraphernalia, including but not limited to, chemical dilutants, weighing scales, mixing bowls, glassine bags, spoons, packing peanuts and USPS shipping materials utilized in the weighing and packaging of controlled substances; and

14. Firearms and other weapons, and ammunition.

All of which constitute fruits, evidence and/or instrumentalities of violations of Title 21, United States Code, Sections 841(a)(1) and 846.